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10 Attorneys for Plaintiff,

11 LegalForce RAPC Worldwide, P.C.

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 LEGALFORCE RAPC WORLDWIDE,  
16 P.C.,

17 Plaintiff,

18 v.

19 TRADEMARK ENGINE LLC,

20 Defendant.

Case No.:3:17-cv-07303-MMC

**NOTICE OF MOTION AND MOTION  
FOR ORDER TO MODIFY PROTECTIVE  
ORDER**

Date: October 4, 2019

Time: 9:00 a.m.

Dept.: Courtroom 7

Judge: Hon. Maxine M. Chesney

1 TO DEFENDANT TRADEMARK ENGINE, LLC (“TME”) AND THEIR  
 2 ATTORNEYS OF RECORD, AND TO BECK, BISMONTE, & FINLEY LLP (COUNSEL  
 3 FOR THIRD-PARTY DEPONENT JOHN C. SALCIDO) AND MIJARES NASH, PLLC  
 4 (COUNSEL FOR THIRD-PARTY DEPONENT HEATHER A. SAPP):

5 PLEASE TAKE NOTICE that on October 4, 2019, at 9:00 a.m., in Courtroom 7 of the  
 6 above-entitled Court, located at 450 Golden Gate Avenue in San Francisco, California, plaintiff  
 7 LegalForce RAPC Worldwide P.C. (“RAPC”) will and hereby does move this Court for an  
 8 order to amend the protective order entered on February 4, 2019 (Dkt. 127), as stated in the  
 9 accompanying proposed order. This motion is based on Mr. Abhyanker’s constitutional rights to  
 10 due process and effective assistance of counsel as to various disciplinary Complaints filed by  
 11 the United States Patent & Trademark Office (“USPTO”) against at least five (“5”) current and  
 12 former attorneys of RAPC now pending before an Administrative Law Judge (“ALJ”) of the  
 13 Housing and Urban Development (“HUD”), and scheduled for trial in November 2019. It is  
 14 based on the terms of the protective order (Dkt. 127 at 13, ¶ 12.1), as well as established case  
 15 law.

16 In support of this motion, Plaintiff submits the accompanying Memorandum of Points  
 17 and Authorities, the accompanying declaration of Raj V. Abhyanker, and the accompanying  
 18 Proposed Order.

19  
 20 Dated: August 30, 2019

LEGALFORCE RAPC WORLDWIDE P.C.

21 /Raj Abhyanker/  
 22 Raj V. Abhyanker  
 23 Attorney for Plaintiff:  
 24 LegalForce RAPC Worldwide, P.C.  
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